## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	) CHAPTER 11
W.R. GRACE & CO., et al.,	Case No. 01-01139 (JKF) (Jointly Administered)
Debtors.	
	) Re: Docket Nos. 26154, 26155, and 26289

ANDERSON MEMORIAL HOSPITAL'S OBJECTIONS PURSUANT TO FED. R. BANKR. P. 9033 TO RECOMMENDED FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER REGARDING CONFIRMATION OF FIRST AMENDED JOINT PLAN OF REORGANIZATION, AND MEMORANDUM OPINION REGARDING OBJECTIONS TO CONFIRMATION OF FIRST AMENDED JOINT PLAN OF REORGANIZATION AND RECOMMENDED SUPPLEMENTAL FINDINGS OF FACT AND CONCLUSIONS OF LAW, PURSUANT TO FED. R. BANKR. P. 9033

Anderson Memorial Hospital, through undersigned counsel, hereby files these objections pursuant to Fed. R. Bankr. P. 9033 to the Court's Recommended Findings of Fact, Conclusions of Law and Order Regarding Confirmation of First Amended Joint Plan of Reorganization as Modified Through December 23, 2010 ("Recommended Findings," D.I. 26155) and Memorandum Opinion Regarding Objections to Confirmation of First Amended Joint Plan of Reorganization and Recommended Supplemental Findings of Fact and Conclusions of Law ("Memorandum Opinion," D.I. 26154), as modified by the Court's Order Clarifying Memorandum Opinion and Order Confirming Joint Plan as Amended Through December 23, 2010 ("Clarifying Order", D.I. 26289), and states:

- 1. On January 31, 2011, the Court entered the Recommended Findings and Memorandum Opinion.
- 2. On February 11, 2011, Anderson timely moved to extend the time to file objections to the Court's recommended findings and conclusions, to the extent the Recommended Findings and Memorandum Opinion are construed as such (D.I. 26245).

Anderson's motion for extension was granted by Order dated February 11, 2011, extending the time for filing objections under Fed. R. Bankr. P. 9033 to February 28, 2011 (D.I. 26252).

- 3. The parties have stipulated that to the extent parties file objections pursuant to Fed. R. Bankr. P. 9033, they may be filed in summary fashion, with detailed briefing and support to be reserved and coordinated with the appellate briefing with respect to the Recommended Findings and Memorandum Opinion.
- 4. Accordingly, to the extent the Recommended Findings and Memorandum Opinion constitute recommendations to the District Court to enter an order confirming the Plan Proponents' Plan and/or to enter injunctions pursuant to 11 U.S.C. § 524(g), Anderson, for the reasons expressed in its Objections to Confirmation of Debtors' First Amended Joint Plan (D.I. 21782), Trial Brief on Phase II Objections to Confirmation of Debtors' First Amended Joint Plan (D.I. 22437), Pre-Trial Submission (D.I. 22557), Pre-Trial Submission (Amended) (D.I. 22947), Objections to Confirmation of Debtors' First Amended Joint Plan Regarding Feasibility (D.I. 22963), Post-Trial Brief Regarding Feasibility (D.I. 23650), and Post-Trial Brief on its Objections to Confirmation of Debtors' First Amended Joint Plan (D.I. 23972), which are incorporated herein by reference, hereby objects, and reserves the right to provide detailed briefing and support for such objections in conjunction with the appellate briefing schedule to be set in these matters.

DATED: February 28, 2011

Christopher D. Loizides (No. 3968)

LOIZIDES, P

1225 King Street, Suite 800 Wilmington, DE 19801

Telephone:

(302) 654-0248 Facsimile: (302) 654-0728

Email: loizides@loizides.com Daniel A. Speights
C. Alan Runyan
SPEIGHTS & RUNYAN
200 Jackson Avenue East
Post Office Box 685
Hampton, SC 29924

Telephone: (803) 943-4444 Facsimile: (803) 943-4599

-and-

John W. Kozyak David L. Rosendorf KOZYAK TROPIN & THROCKMORTON, P.A. 2525 Ponce de Leon, 9<sup>th</sup> Floor Coral Gables, FL 33134

Telephone: (305) 372-1800 Facsimile: (305) 372-3508

Counsel for Anderson Memorial Hospital